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FILED

DISTRICT COURT OF GUAM

JAN - 9 2007

MARY L.M. MORAN
CLERK OF COURT

IN THE UNITED STATES DISTRICT COURT

FOR THE TERRITORY OF GUAM

11 UNITED STATES OF AMERICA,) MAGISTRATE CASE NO. 07-00001
12 Plaintiff,)
13)
14)
15 DOMINIC C. BORJA,)
16 MARIANO C. SALAS, and)
17 ENRIQUE REYES TEDTAOTAO,)
18 Defendants.)
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28)
CONSPIRACY (Count I)
[18 U.S.C. § 371]
UNLAWFUL TAKING OF WILD
ANIMAL (Count II)
[5 GCA § 63121, 18 U.S.C. § 7(3),
18 USC § 13, and 16 USC § 3372]
ENTERING MILITARY, NAVAL, OR
COAST GUARD PROPERTY (Count III)
[18 U.S.C. § 1382]

19 THE UNITED STATES ATTORNEY CHARGES:

COUNT I - CONSPIRACY

21 On or about November 19, 2006, in the District of Guam, the defendants, DOMINIC C.
22 BORJA, MARIANO C. SALAS, and ENRIQUE REYES TEDTAOTAO did conspire together
23 to go upon a United States military reservation, to wit, Andersen Air Force Base to unlawfully
24 take a wild animal, in violation of 5 Guam Code Annotated, Section 63121 and 16 USC § 3372,
25 as assimilated by Title 18, United States Code, Sections 7(3) and 13, in violation of 18 U.S.C.
371.

COUNT II - UNLAWFUL TAKING OF WILD ANIMAL

2 On or about November 19, 2006, in the District of Guam, the defendants, DOMINIC C.
3 BORJA, MARIANO C. SALAS, and ENRIQUE REYES TEDTAOTAO did go upon a United
4 States military reservation, to wit, Andersen Air Force Base and did unlawfully take a wild
5 animal, in violation of 5 Guam Code Annotated, Section 63121 and 16 USC § 3372, as
6 assimilated by Title 18, United States Code, Sections 7(3) and 13.

COUNT III- ENTERING MILITARY, NAVAL, OR COAST GUARD PROPERTY

8 On or about November 19, 2006, in the District of Guam, the defendants, DOMINIC C.
9 BORJA, MARIANO C. SALAS, and ENRIQUE REYES TEDTAOTAO did go upon a United
10 States military reservation, to wit, Andersen Air Force Base, for a purpose prohibited by law,
11 that is, intending to engage in conduct in violation of 5 Guam Code Annotated, Section 63121
12 and 16 USC § 3372, as assimilated by Title 18, United States Code, Sections 7(3) and 13, in
13 violation of 18 U.S.C. 1382.

14 DATED this 9th day of January, 2007.

LEONARDO M. RAPADAS
United States Attorney
Districts of Guam and NMI

By:


KRISTIN D. ST. PETER
Special Assistant U.S. Attorney